

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for courtesies extended during the Examiner Interview conducted on May 18, 2007, and for carefully considering this application.

Disposition of Claims

Claims 1-10, 18, 19, and 29-40 are currently pending in this application. Claims 1 and 18 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 18.

Claim Amendments

Independent claims 1 and 18 have been amended to clarify the present invention as recited. In particular, independent claims 1 and 18 now recite two distinct subscriptions: (i) a subscription to broadcast services; and (ii) a subscription to internet services, wherein the two subscriptions are *linked* so that both subscriptions can be managed together. No new subject matter is added by way of these amendments. Support for these amendments may be found, for example, at least on page 12, lines 26-34 of the Specification.

Objections

Claims 33 and 38 are objected to by the Examiner for minor informalities. The informalities pointed out by the Examiner have been corrected by removing the phrase "PP4 protocol layer," and spelling out the complete form of "MSD number." Accordingly, withdrawal of these objections is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1-10, 18-19, and 29-40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,983,273 (“White”) in view of U.S. Patent No. 6,459,427 (“Mao”). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

As discussed during the Examiner Interview conducted on May 18, 2007, the present invention is directed toward providing a subscriber with access to internet services via the subscriber’s *subscription to broadcast services* (i.e., services such as television services, radio services, etc.) (see Specification, Figure 1 and accompanying text). The claimed invention allows a subscriber that is already receiving broadcast services to obtain access to internet services using *the same broadcast identifier* that is associated with the broadcast service subscription. Further, as recited by the amended independent claims, the subscriber’s subscription to broadcast services is linked to a subscription for internet services, such that both subscriptions may be managed together (see Specification, page 12).

To establish a *prima facie* case of obviousness “...the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (See MPEP §2143.03). Further, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” (See MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of amended independent claim 1.

As discussed with the Examiner during the Examiner Interview of May 18, 2007, White relates to providing only internet services to a subscriber. The WebTV system of White allows a subscriber to obtain access to internet services via a set-top-box or television set, but the subscriber does not have to already have a broadcast subscription for any type of broadcast

services. Furthermore, in White, the access to internet services is not, in any way, associated with a broadcast subscription, much less a *unique identifier* based on a broadcast subscription. Rather, the internet services are simply accessed by a subscriber via a television set (*see* White, Figure 2).

Because having a broadcast subscription is not required by the system of White (rather, only having a television set is required), it does not make sense for the internet services offered by the WebTV of White to be *linked* to a broadcast subscription, as required by the amended independent claims of the present invention. In fact, as pointed out by the Examiner during the Interview of May 18, 2007, the only portion of White that discusses any type of television service is column 4, lines 39-41, and the accompanying components shown in Figure 3, none of which teach or suggest the linking of a broadcast subscription and an internet subscription to facilitate the management of both subscriptions together. Instead, the cited portion of White only discloses that a television is provided with audio and video output via a digital-to-analog converter and an ASIC, respectively. Neither the audio nor the video output taught by White relates to a *broadcast subscription*. Even more importantly, the cited portion of White is completely silent with respect to two subscriptions, one for broadcast services and one for internet services, which are linked together.

Further, Mao fails to supply that which White lacks, as evidenced by the fact that the Examiner relies on Mao solely for the purpose of disclosing a gateway that converts data output by the receiver/decoder to be compliant with network protocols. Mao does not teach or suggest internet services provided using a unique identifier based on a subscription to broadcast services, nor does Mao teach or suggest a broadcast subscription and an internet subscription linked and managed together.

In view of the above, it is clear that amended independent claims 1 and 18 are patentable over White and Mao, whether considered separately or in combination. Further, dependent claims 2-10, 19, and 29-40 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345/042001).

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Respectfully submitted,

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